

ORIGINAL

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- V. -

MIGUEL MARGOLLA,	:	S1 13 Cr. 880
CARLOS MARTINEZ,	:	
a/k/a "B-Way,"	:	
DESIO ALLEN,	:	
a/k/a "T.O."	:	
JUSTICE BEARD,	:	
EBAN CARRION,	:	
a/k/a "Five,"	:	
BARRY COOPER,	:	
a/k/a "B-Nyse,"	:	
TAUREAN LIGHTFOOT,	:	
a/k/a "T-Streets,"	:	
RICHARD LOCKETT,	:	
a/k/a "Wall Street,"	:	
CLIFFORD SHAMSUNDAR,	:	
a/k/a "Face," and	:	
RASHID WESTON,	:	

**Defendants.**

USDC SDNY  
DOCUMENT  
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DOC #: \_\_\_\_\_  
DATE FILED:

COUNT ONE

The Grand Jury charges:

1. From at least in or about 2007, up to and including in or about 2013, in the Southern District of New York and elsewhere, MIGUEL MARGOLLA, CARLOS MARTINEZ, a/k/a "B-Way," DESIO ALLEN, a/k/a "T.O.," JUSTICE BEARD, EBAN CARRION, a/k/a "Five," BARRY COOPER, a/k/a "B-Nyse," TAUREAN LIGHTFOOT, a/k/a "T-Streets," RICHARD LOCKETT, a/k/a "Wall Street," CLIFFORD SHAMSUNDAR, a/k/a "Face," and RASHID WESTON, a/k/a "Gutta," the

defendants, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that MIGUEL MARGOLLA, CARLOS MARTINEZ, a/k/a "B-Way," DESIO ALLEN, a/k/a "T.O.," JUSTICE BEARD, EBAN CARRION, a/k/a "Five," BARRY COOPER, a/k/a "B-Nyse," TAUREAN LIGHTFOOT, a/k/a "T-Streets," RICHARD LOCKETT, a/k/a "Wall Street," CLIFFORD SHAMSUNDAR, a/k/a "Face," and RASHID WESTON, a/k/a "Gutta," the defendants, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substance that MIGUEL MARGOLLA, CARLOS MARTINEZ, a/k/a "B-Way," DESIO ALLEN, a/k/a "T.O.," JUSTICE BEARD, EBAN CARRION, a/k/a "Five," BARRY COOPER, a/k/a "B-Nyse," TAUREAN LIGHTFOOT, a/k/a "T-Streets," RICHARD LOCKETT, a/k/a "Wall Street," CLIFFORD SHAMSUNDAR, a/k/a "Face," and RASHID WESTON, a/k/a "Gutta," the defendants, conspired to distribute and possess with the intent to distribute was one kilogram or more of mixtures and substances containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 841(b)(1)(A).

(Title 21, United States Code, Section 846.)

COUNT TWO

The Grand Jury further charges:

4. From at least in or about 2012, up to and including in or about 2013, in the Southern District of New York, CARLOS MARTINEZ, a/k/a "B-Way," DESIO ALLEN, a/k/a "T.O.," BARRY COOPER, a/k/a "B-Nyse," and RASHID WESTON, a/k/a "Gutta," the defendants, during and in relation to a narcotics trafficking crime for which they may be prosecuted in a court of the United States, namely, the narcotics trafficking conspiracy charged in Count One of this Indictment, knowingly did use and carry firearms, and, in furtherance of such crime, did possess firearms, and did aid and abet the use, carrying, and possession of firearms.

(Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.)

FORFEITURE ALLEGATION

5. As a result of committing the controlled substance offense alleged in Count One of this Indictment, MIGUEL MARGOLLA, CARLOS MARTINEZ, a/k/a "B-Way," DESIO ALLEN, a/k/a "T.O.," JUSTICE BEARD, EBAN CARRION, a/k/a "Five," BARRY COOPER, a/k/a "B-Nyse," TAUREAN LIGHTFOOT, a/k/a "T-Streets," RICHARD LOCKETT, a/k/a "Wall Street," CLIFFORD SHAMSUNDAR, a/k/a "Face," and RASHID WESTON, a/k/a "Gutta," the defendants, shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any and all property constituting or derived from any proceeds said

defendants obtained directly or indirectly as a result of the violation and any and all property used or intended to be used in any manner or part to commit or to facilitate the commission of the violation alleged in Count One of this Indictment, including but not limited to a sum in United States currency representing the amount of proceeds obtained as a result of the offense.

Substitute Assets Provision

6. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 21, United States Code, Sections 841(a)(1) and 853.)

Michael A. Dunn  
FOREPERSON Deputy

Preet Bharara  
PREET BHARARA  
United States Attorney

